



525 Seventh Avenue, Ste 1810  
New York, NY 10018  
t. 646-760-7013  
sk@kakarlaw.net  
kalpana@kakarlaw.net  
[www.kakarlawpc.com](http://www.kakarlawpc.com)

**Sumeer Kakar, Esq. | Kalpana Nagampalli, Esq.**

February 15, 2024

**Via ECF**

Hon. Mary Kay Vyskocil  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St. New York, NY 10007

Re: Style Stitch, Inc. v. The Avyan Group, LLC 1:23-cv-10701-MKV  
Pending Motion to Dismiss Opposition  
**Request for Extension of Time**

Dear Judge Vyskocil:

The undersigned, as counsel of record for Plaintiff Style Stitch, Inc. ("SSI"), is in receipt of Defendant's motion. *See* Dk. No. 15. While the undersigned has prepared its opposition, due today, we have encountered challenges to complete our opposition papers by today. We have not made any previous requests for an extension of time for any deadline in this case. The original due date for the opposition papers to the Defendant's motion to dismiss is today—February 15, 2024, and we request an extension of time to respond by February 26, 2024.

The reason for the current request is that we are facing challenges in communicating with our client (who is based overseas) to review and execute on relevant declarations. We need additional time to finish the process of review and execution for papers to complete our opposition papers. We had expected to have the papers to be executed and in our possession this morning, which is why the instant request to extend time is late and not within 72 hours of the original due date.

We have communicated the foregoing with opposing counsel, Mr. Frisch, and he has consented to this request. Moreover, Mr. Frisch asked that I propose February 26, 2024 as the new responsive date for the opposition papers because he is traveling next week.

Thus, we write to respectfully request for an extension of time, pursuant to your Honor's Individual Rules of Practice of Civil Procedure, Section 2.G.

In sum, we respectfully ask (with all parties consent) to extend the Plaintiff's time to file its opposition papers to the Defendant's motion to Dismiss until February 26, 2024, due to unexpected delays in finishing and procuring executed declarations from the Plaintiff (who is based overseas).

Thank you for your time and consideration.

Respectfully Submitted,  
/s/ Sumeer Kakar  
Sumeer Kakar, Esq.